

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SERGIO BONILLA, on behalf of himself and all others similarly situated,)	
)	
)	Case No. 1:21-cv-00051
Plaintiff,)	
)	Hon. Judge Virginia M. Kendall
v.)	
)	Magistrate Judge Gabriel A. Fuentes
PEOPLECONNECT, INC., a Delaware)	
Corporation,)	
)	
Defendant.)	

THERESA LOENDORF, on behalf of herself and all others similarly situated,)	
)	
)	Case No. 1:21-cv-00610
Plaintiff,)	
)	Hon. Judge Virginia M. Kendall
v.)	
)	Magistrate Judge Gabriel A. Fuentes
PEOPLECONNECT, INC., a Delaware)	
Corporation,)	
)	
Defendant.)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANT
PEOPLECONNECT, INC. TO ANSWER OR OTHERWISE PLEAD**

Defendant PeopleConnect, Inc. (“PeopleConnect”) respectfully submits this unopposed motion for an extension of time for PeopleConnect to answer or otherwise respond to Plaintiffs’ Consolidated Class Action Complaint. In support of this motion, PeopleConnect states as follows:

1. On January 5, 2021, Plaintiff Sergio Bonilla, on behalf of himself and all others similarly situated, filed a Class Action Complaint against PeopleConnect. *See* Dkt. No. 1.

2. On February 2, 2021, Plaintiff Theresa Loendorf, individually and on behalf of all others similarly situated, filed a Class Action Complaint against PeopleConnect. *See* No. 21-cv-610 (N.D. Ill.), Dkt. No. 1.

3. On February 17, 2021, PeopleConnect filed an agreed motion for an extension of time to answer or otherwise respond to Bonilla's complaint. *See* Dkt. No. 10. Judge Pacold granted the motion, allowing PeopleConnect until April 5, 2021 to answer or otherwise plead. *See* Dkt. No. 11.

4. On March 2, 2021, the Bonilla action was reassigned to this Court. *See* Dkt. No 12.

5. On March 3, 2021, PeopleConnect moved to reassign and consolidate the Loendorf matter with the Bonilla matter. *See* Dkt. No. 13. On March 12, 2021, this Court granted PeopleConnect's motion to reassign and consolidate and consolidated the matters under case number 21-cv-51. *See* Dkt. No. 16.

6. On April 5, 2021, PeopleConnect filed a consolidated motion to dismiss Plaintiffs' complaints along with related filings. *See* Dkt. Nos. 26-29.

7. Plaintiffs' responses to PeopleConnect's motion to dismiss were due April 20, 2021. *See* Dkt. No. 31. On April 20, 2021, Plaintiffs filed a Consolidated Class Action Complaint against PeopleConnect. *See* Dkt. 37.

8. PeopleConnect's deadline to answer or otherwise plead in response to the Consolidated Class Action Complaint is currently May 4, 2021. Because of competing prior obligations in a number of matters, PeopleConnect needs additional time to answer or otherwise plead in response to the Consolidated Class Action Complaint.

9. On April 22, 2021, counsel for PeopleConnect reached out to Plaintiffs' counsel to request an extension through May 10, 2021 to answer or otherwise plead. Plaintiffs' counsel indicated that they do not oppose the request.

10. This is PeopleConnect's first motion for an extension of time to respond to the Consolidated Class Action Complaint, and its second motion for an extension of time to answer or otherwise plead. *See* Dkt. No. 10.

11. Granting this request for an extension of time will neither prejudice any party nor unreasonably delay this litigation.

WHEREFORE, for the reasons stated herein, PeopleConnect respectfully requests that the Court grant this motion and enter an Order extending the deadline for Defendant PeopleConnect, Inc. to answer or otherwise plead up to and including May 10, 2021.

Dated: April 26, 2021

Respectfully Submitted,

PEOPLECONNECT, INC.

By: /s/ Wade A. Thomson

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Attorneys for Defendant PeopleConnect, Inc.

CERTIFICATE OF SERVICE

I, Wade A. Thomson, certify that on April 26, 2021, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a Notice of Electronic Filing to all counsel of record.

/s/ Wade A. Thomson
Wade A. Thomson